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July 5, 2022

C #:  
FILED: 7/6/2022

Via ECF

Hon. Colleen McMahon  
United States District Judge  
U.S. District Court, Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Paul Bereswill v. The Mundial Group Inc.*  
Docket No: 1:22-cv-02997-CM

Conference cancelled  
*Colleen McMahon*  
7/6/2022

Dear Judge McMahon:

We are the attorneys for Plaintiff Paul Bereswill in this matter and write to respectfully request the Court adjourn the Initial Conference scheduled for July 14, 2022 at 11:00 a.m., as well as the deadline to file the parties' proposed case management plan, sine die.

Plaintiff makes this request as the Defendant The Mundial Group Inc. is in default of appearing and answering the complaint, and the Clerk's Certificate of Default was entered against Defendant on June 23, 2022 [Dkt. No. 12]. Plaintiff has attempted to contact Defendant regarding possible resolution of this matter. If the parties are unable to resolve, and if Defendant does not appear in the action, Plaintiff intends to proceed with its motion for default judgment within forty-five (45) days. Pursuant to Section 1(D)(2) of Your Honor's Individual Practices and Procedures:

- (1) the original date of the Initial Conference is July 14, 2022;
- (2) no previous requests for adjournment or extension have been made;
- (3) no previous requests were granted or denied;

(4) No other dates will be impacted by this request as Defendant is currently in default of answering or appearing [Dkt. No. 12].

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Renee J. Aragona  
Renee J. Aragona